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*Attorneys for Defendant Google LLC*

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION

CHASOM BROWN, WILLIAM BYATT,  
JEREMY DAVIS, CHRISTOPHER  
CASTILLO, and MONIQUE TRUJILLO,  
individually and on behalf of all similarly  
situated,

Plaintiffs,

v.

GOOGLE LLC,  
Defendant.

Case No. 5:20-cv-03664-LHK-SVK

**DECLARATION OF JONATHAN TSE IN  
SUPPORT OF GOOGLE'S  
ADMINISTRATIVE MOTION TO SEAL  
JOINT LETTER BRIEF RE: DISPUTE  
P16**

Referral: Hon. Susan van Keulen, USMJ

1 I, Jonathan Tse, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney with Quinn  
3 Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC (“Google”) in this action.  
4 I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a  
5 witness, I could and would testify competently thereto.

6 2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of Google’s  
7 Administrative Motion to Seal portions of the parties’ Joint Letter Brief re: Dispute P16 (“Joint  
8 Letter Brief”). In making this request, Google has carefully considered the relevant legal standard  
9 and policy considerations outlined in Civil Local Rule 79-5. Google makes this request with the  
10 good faith belief that the information sought to be sealed consists of Google’s confidential and  
11 proprietary information and that public disclosure could cause competitive harm.

12 3. Google respectfully requests that the Court seal the redacted portions of the Joint  
13 Letter Brief, attached hereto as Exhibit A.

14 4. The information requested to be sealed contains Google’s highly confidential and  
15 proprietary information regarding highly sensitive features of Google’s internal systems and  
16 operations, including details related to internal identifiers and various data logs maintained by  
17 Google, as well as Google’s internal practices with regard to the X-Client-Data Header and its  
18 proprietary functions, that Google maintains as confidential in the ordinary course of its business  
19 and is not generally known to the public or Google’s competitors.

20 5. Such confidential and proprietary information reveals Google’s internal strategies,  
21 system designs, and business practices for operating and maintaining many of its important services,  
22 and falls within the protected scope of the Protective Order entered in this action. *See* Dkt. 81 at 2-  
23 3.

24 6. Public disclosure of such confidential and proprietary information could affect  
25 Google’s competitive standing as competitors may alter their systems and practices relating to  
26 competing products. It may also place Google at an increased risk of cyber security threats, as third  
27 parties may seek to use the information to compromise Google’s data log and identifier system.

1           7.       For these reasons, Google respectfully requests that the Court order the Joint Letter  
2 Brief to be filed under seal.

3           I declare under penalty of perjury of the laws of the United States that the foregoing is true  
4 and correct. Executed in San Francisco, California on July 9, 2021.

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6 DATED: July 9, 2021

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP

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8  
9 By/s/ *Jonathan Tse*

Jonathan Tse

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11 *Attorney for Defendant*  
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